

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Trustee,

v.

SNS BANK N.V., and SNS GLOBAL
CUSTODY B.V.,

Defendants.

Adv. Pro. No. 12-01046 (BRL)

Case No. 12-cv-02509

**CORPORATE OWNERSHIP STATEMENT OF DEFENDANTS SNS BANK N.V. AND
SNS GLOBAL CUSTODY B.V.**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, defendants SNS Bank N.V. and SNS Global B.V., through their undersigned attorneys, state as follows:¹

SNS REAAL N.V. owns more than 10% of the equity interests of SNS Bank N.V.
Stichting Beheer SNS REAAL N.V. in turn owns more than 10% of the equity interests in SNS REAAL N.V.

Stichting Administratiekantoor Bewaarbedrijven SNS owns more than 10% of the equity interests in SNS Global Custody B.V.

Dated: March 30, 2012
New York, New York

Respectfully submitted,

WILMER CUTLER PICKERING HALE
AND DORR LLP

By: /s/ George W. Shuster, Jr.
Andrea J. Robinson
Charles C. Platt
George W. Shuster, Jr.

399 Park Avenue
New York, New York 10022
Telephone: (212) 230-8800
Facsimile: (212) 230-8888
andrea.robinson@wilmerhale.com
charles.platt@wilmerhale.com
george.shuster@wilmerhale.com

*Attorneys for SNS Bank N.V. and
SNS Global Custody B.V.*

¹ The SNS Defendants, foreign financial institutions, do not, by filing this Corporate Ownership Statement, submit to or consent to the jurisdiction of any court or admit any fact or waive any right or defense, including, without limitation, regarding the adequacy of service and the personal jurisdiction of any court over the SNS Defendants, all of which rights and defenses the SNS Defendants expressly reserve.